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Attorneys for Defendant
GARY STEPHEN MAYNARD

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-00224-DAD-1
Plaintiff,)
vs.)
GARY STEPHEN MAYNARD)
Defendant.)
)
) **STIPULATION AND ORDER TO CONTINUE**
) **STATUS CONFERENCE, AND TO EXCLUDE**
) **TIME**
)
) Date: January 31, 2023
) Time: 9:30 a.m.
) Judge: Hon. Dale A. Drozd
)
)

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, United States Attorney Phillip A. Talbert, through Assistant United States Attorney Michael Anderson, attorney for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hannah Labaree, attorney for defendant Gary Stephen Maynard, that the previously-scheduled status conference date of January 31, 2023, be vacated and the matter be set for status conference on February 14, 2023 at 9:30 a.m., at the defendant's request.

The defense requests additional time to review the discovery with her client, who is in custody at the Nevada City Jail, located one hour 15 minutes from the Office of the Federal Defender in downtown Sacramento. The parties are in active discussions regarding resolution of the case.

Based upon the foregoing, the parties agree that time under the Speedy Trial Act should

1 be excluded from this order's date through and including February 14, 2023, pursuant to 18
2 U.S.C. §3161 (h)(7)(A)and (B)(iv) (reasonable time to prepare), and General Order 479, Local
3 Code T4, based upon continuity of counsel and defense preparation.

4 Counsel and the defendants also agree that the ends of justice served by the Court
5 granting this continuance outweigh the best interests of the public and the defendant in a speedy
6 trial.

7 Respectfully submitted,

8 Dated: January 25, 2023

HEATHER E. WILLIAMS
Federal Defender

10 */s/ Hannah Labaree*
11 HANNAH LABAREE
12 Assistant Federal Defender
Attorney for Defendant
Gary Stephen Maynard

13 Dated: January 25, 2023

PHILLIP A. TALBERT
United States Attorney

15 */s/Michael Anderson*
16 MICHAEL ANDERSON
17 Assistant U.S. Attorney
18 Attorney for Plaintiff

ORDER

Having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court also finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date of this order, up to and including February 14, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the January 31, 2023 status conference shall be continued until February 14, 2023, at 9:30 a.m. However, no further continuances of the status conference in this case will be granted absent a compelling showing of good cause based upon reasons and circumstances in addition to those already presented.

IT IS SO ORDERED.

Dated: **January 26, 2023**

Dale A. Droyd
UNITED STATES DISTRICT JUDGE